THE HONORABLE BARBARA J. ROTHSTEIN 2 3 4 5 6 7 8 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 9 AT SEATTLE 10 No. 2:13-cv-00937-BJR JAMES R. HAUSMAN, 11 STIPULATION AND ORDER TO STAY Plaintiff, PROCEEDINGS TO ENFORCE 12 **JUDGMENT** v. 13 HOLLAND AMERICA LINE-U.S.A., a Washington corporation; HOLLAND 14 AMERICA LINE, INC., a Washington corporation; HOLLAND AMERICA LINE 15 N.V., a Curacao corporation; and HAL ANTILLEN N.V., a Curação corporation. 16 Defendants. 17 COME NOW Plaintiff JAMES R. HAUSMAN and Defendants HOLLAND 18 AMERICA LINE - U.S.A. et al. (collectively "HAL"), and pursuant to Fed. R. Civ. P. 62(b) 19 stipulate for the Court to stay the execution of judgment-or any proceedings to enforce it-20 21 until 30 days after HAL files a notice of appeal, or the time to file notice of appeal expires, 22 whichever comes first, without prejudice to HAL seeking a stay pending an appeal pursuant to 23 Fed. R. Civ. P. 62(d).

STIPULATION AND ORDER TO STAY PROCEEDING TO ENFORCE JUDGMENT No. 2:13-cv-00937-BJR – Page 1 NIELSEN + SHIELDS

P L L C

1000 Second Avenue, Suite 1950

Seattle, Washington 98104

1 <u>ORDER</u> 2 Further to the parties' stipulation, the Court, pursuant to Fed. R. Civ. P. 62(b), stays the 3 execution of judgment—or any proceedings to enforce it—until 30 days after HAL files a 4 notice of appeal, or the time to file notice of appeal expires, whichever comes first, without 5 prejudice to HAL seeking a stay pending an appeal pursuant to Fed. R. Civ. P. 62(d). 6 7 So ORDERED. 8 Dated this ____ day of November 2015. 9 THE HONORABLE BARBARA J. ROTHSTEIN 10 UNITED STATES DISTRICT JUDGE 11 12 13 14 15 16 17 18 19 20 21 22 23

1	Agreed as to substance and form.	
2	DATED this 12 th day of November, 2015.	
3	s/Kenneth R. Friedman (per authority)	
4	Kenneth R. Friedman, WSBA #17148	
5	FRIEDMAN RUBIN 1126 Highland Avenue	
6	Bremerton, WA 98337 Telephone: (360) 782-4300	
7	Facsimile: (360) 782-4358	
8	E-Mail: kfriedman@friedmanrubin.com Attorney for Plaintiff	
9	Agreed as to substance and form.	
10	DATED this 12 th day of November, 2015.	
11	S/Louis Shields	
12	LOUIS A. SHIELDS, WSBA # 25740 NIELSEN SHIELDS, PLLC	
13	1000 Second Avenue, Suite 1950 Seattle, Washington 98104	
14	Telephone: 206-728-1300 Facsimile: 206-728-1302	
15	Email: las@nielsenshields.com Attorneys for HAL Defendants	
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CERTIFICATE OF SERVICE 2 I hereby certify that on November 12, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, 3 which will send notification of such filing to the following: 4 Herbert Farber, Esq. The Farber Law Group 5 PO Box 69 Bellevue, WA 98009-0069 6 Kenneth R. Friedman, Esq. 7 William S. Cummings, Esq. Friedman Rubin 8 1126 Highland Ave Bremerton, WA 98337 9 Richard H. Friedman, Esq. 10 David R. Roosa, Esq. Roger S. Davidheiser, Esq. 11 Friedman Rubin 51 University Street, Suite 201 12 Seattle, WA 98101 13 I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct. 14 Signed at Seattle, Washington. 15 <u>Sheila Baskins</u> 16 Legal Assistant 1000 Second Avenue, Suite 1950 Seattle, Washington 98104 17 Telephone: 206-728-1300 Facsimile: 206-728-1302 18 smb@nielsenshields.com 19 20 21 22 23

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